

\_\_\_\_\_: \_\_\_\_\_ JUDICIAL DISTRICT COURT  
VS \_\_\_\_\_: PARISH OF \_\_\_\_\_, LOUISIANA  
\_\_\_\_\_: DOCKET NO. \_\_\_\_\_  
AND \_\_\_\_\_

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**ANSWER TO SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

NOW INTO COURT, through undersigned counsel, comes \_\_\_\_\_,  
Plaintiff, and for answer to the Defendants= Second Request for Production of Documents,  
says:

1.

**REQUEST FOR PRODUCTION NO. 23:**

Plaintiff=s state and federal income tax returns for 20\_\_\_\_\_, with attachments such as  
W-2 and Form 1099.

See attached.

2.

**REQUEST FOR PRODUCTION NO. 24:**

Please produce any and all of your credit reports, or documents reflecting your credit  
reports, or documents reflecting your credit history or experience, obtained by you from  
\_\_\_\_\_ 20\_\_\_\_\_, through the present.

See attached.

3.

**REQUEST FOR PRODUCTION NO. 25:**

Please produce a copy of any and all doctor=s notes you tendered to  
\_\_\_\_\_ to justify your absence from work at any time in 20\_\_\_\_\_ and 20\_\_\_\_\_.

None.

4.

**REQUEST FOR PRODUCTION NO. 26:**

Please produce any witness statements taken by you in connection with this action.

None.

5.

**REQUEST FOR PRODUCTION NO. 27:**

Please produce any and all correspondence or other documents, reflecting communications between you and \_\_\_\_\_ from \_\_\_\_\_, 20\_\_\_\_ through the present.

See attached.

6.

**REQUEST FOR PRODUCTION NO. 28:**

Please produce any and all documents reflecting your payments to \_\_\_\_\_ from \_\_\_\_\_, 20\_\_\_\_ through the present.

None in possession, currently attempting to locate. Will provide as soon as possible.

7.

**REQUEST FOR PRODUCTION NO. 29:**

Please produce any and all documents reflecting your claim that your credit history has been damaged as a result of any actions by \_\_\_\_\_, it agents or employees, including but not limited to your account statements from \_\_\_\_\_.

See attached.

WHEREFORE, Plaintiff, \_\_\_\_\_, prays for judgment in his favor and against Defendant, rejecting its demands at its costs.

\_\_\_\_\_  
\_\_\_\_\_  
Attorney for Plaintiff  
\_\_\_\_\_, LA \_\_\_\_\_  
(\_\_\_\_\_)\_\_\_\_\_

**CERTIFICATE**

I certify that a copy of the foregoing Answer to Second Request for Production of Documents has been served upon counsel for Defendant, \_\_\_\_\_, Attorney at Law, \_\_\_\_\_, \_\_\_\_\_, LA \_\_\_\_\_, properly addressed and postage prepaid on this \_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

\_\_\_\_\_  
\_\_\_\_\_